



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 06 2010

REPLY TO THE ATTENTION OF:

E-19J

Constance Chaney, District Ranger
Great Divide Ranger District
Chequamegon-Nicolet National Forest
P.O. Box 896
Hayward, Wisconsin 54843

Re: Draft Environmental Impact Statement for the Proposed Twin Ghost Vegetation and
Transportation Management Project on the Chequamegon-Nicolet National Forest,
Great Divide Ranger District, Wisconsin – EIS No. 20090400

Dear Ms. Chaney:

The U.S. Environmental Protection Agency has reviewed the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (EIS) for the above-mentioned project. Our review is pursuant to the National Environmental Policy Act, the Council on Environmental Quality regulations, and Section 309 of the Clean Air Act.

The purpose for the proposed activities is to implement land management activities consistent with the direction of the adopted 2004 Land and Resource Management Plan (Forest Plan) for the Chequamegon-Nicolet National Forest (Forest). Proposed management activities will address major gaps between desired future conditions as stated in the Forest Plan and current conditions found in the project area.

Project objectives include the following:

- Improve forest health by increasing tree growth and vigor;
- Provide a balanced distribution of aspen age classes for early successional-dependent species;
- Increase the amount of habitat for spruce grouse;
- Reduce the amount of ladder fuels in wildland-urban interface areas;
- Provide forest commodities; and
- Improve the transportation system.

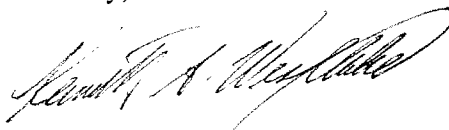
The Draft EIS documents the analysis of five alternatives and indicates the Responsible Official prefers the vegetation aspects of Alternative 3 and the motorized access aspects of Alternative 4. Alternative 3 addresses concerns about biomass removal, deer browse, Regional Forester sensitive species habitat, and elk/vehicle collisions. Alternative 4 was developed to address lost motorized access opportunities by leaving more roads open for public motorized vehicle access than the other alternatives.

Based on our review of the Draft EIS and discussions between Kathy Kowal of my staff and USFS personnel, we have assigned a rating of "Environmental Concerns – Insufficient Information" (EC-2) to this Draft EIS. We conclude the two Alternatives preferred by the Responsible Official are consistent with the Forest Plan. However, we recommend the Final EIS include a revised cumulative impacts analysis.

The Draft EIS states that present and reasonably foreseeable actions that were occurring or had a developed proposed action as of November 1, 2008 were included in the cumulative impacts analysis for this project. Since the initiation of this analysis, additional projects have been proposed across the Forest, most notably the Honey Creek-Padus Project. The analysis for the Honey Creek-Padus Project has progressed ahead of that for the Twin Ghost project, and a Draft EIS for the Honey Creek-Padus Project was released for public comment during October, 2009. We therefore recommend the cumulative impacts analysis for this project be revised for the Final EIS to include the proposed effects of the Honey Creek-Padus Project, as appropriate.

Please send one copy of the Final EIS and Record of Decision to my attention once it becomes available. Should you have any questions regarding the contents of this letter, please do not hesitate to contact me or Kathy Kowal of my staff at (312) 353-5206 or via email at kowal.kathleen@epa.gov. A summary of the rating system used in the evaluation of this document is enclosed for your reference.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure

cc: Jim McDonald, Regional Environmental Coordinator, USFS, Milwaukee, WI